

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN)
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This document relates to: All Cases

DECLARATION OF ROBERT M. HORKOVICH, ESQ.

I, Robert M. Horkovich, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am the managing shareholder of the law firm Anderson Kill P.C. ("Anderson Kill") and have entered an appearance in the above-reference matter.
2. On July 15, 2021, I learned from Jerry S. Goldman, Esq. that Yahoo! News published an article authored by journalist Michael Isikoff, reporting that he had obtained a copy of a transcript of Mussaed al Jarrah's recent deposition in the September 11th litigation. See Michael Isikoff, FBI Tried to Flip Saudi Official in 9/11 Investigation, Yahoo! News, July 15, 2021.¹
3. I understand that on June 28, 2021, a paralegal at my firm, Emily Rybicki, received via email, the final transcripts of the Jarrah deposition from the court reporter. I understand that on July 7, 2021, Ms. Rybicki received a link to the videos of the deposition.
4. On July 13, 2021, a few days after Ms. Rybicki returned from vacation, I understand that she moved the transcripts and videos into a secure shared folder on our electronic file system that was created primarily for downloading confidential deposition

¹ I did attend substantial portions of the deposition.

materials from the September 11, 2001 litigation. Only she, Jerry Goldman, Esq., Bruce Strong, Esq., two (2) members of our IT department (Robin Pramanand and Mark Guercio), and I have access.

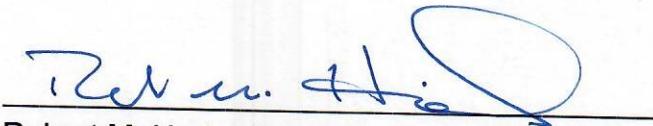
5. At no time did I copy, print, forward, or otherwise provide electronic or hard copies of the Jarrah deposition transcripts to anyone within Anderson Kill, or individuals outside the firm, via email or other delivery methods.

6. On June 17 and 18, 2021, I understand that Ms. Rybicki received via email from the court reporter, rough transcripts of the deposition of Mussaed al Jarrah. I understand that she forwarded me the rough transcripts on June 22, 2021 by email. Although I understand the rough drafts of the Jarrah deposition transcripts are not in issue, I also have not copied, printed, forwarded, or otherwise provided electronic or hard copies of the rough transcripts to anyone within or outside of Anderson Kill.

7. I have never spoken to or contacted Michael Isikoff in any way about anything, including the Jarrah deposition or the transcripts.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed in Westport CT on 7/30/21


Robert M. Horkovich, Esq.